

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

)	CIVIL ACTION NO. 04-30129-MAP
PATRICIA WASHINGTON,)	
)	
Plaintiff,)	JAMES E. WALLACE, JR BBO# 513440
)	KATHRYN ABARE-O'CONNELL BBO# 647594
v.)	
)	SUZANNE GARROW, BBO # 636548
SPRINGFIELD COLLEGE,)	
)	
Defendant.)	
)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant and subject to the provisions of Rule 16.1 of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the parties have conferred concerning an agenda of matters to be discussed at the Scheduling Conference and a proposed pretrial schedule for the case, and hereby submit the following Joint Statement.

1. Proposed Agenda

The parties suggest that an appropriate agenda for the Scheduling Conference includes setting a pretrial schedule and discussing potential ADR options.

2. Pending Motions

None.

3. **Proposed Pretrial Schedule:** The parties have agreed on all dates for the following pretrial schedule.

- a. Automatic discovery disclosures will be completed on or before December 30, 2004.
- b. Supplemental or amended pleadings shall be filed on or before January 31, 2005.
- c. Written discovery (interrogatories, requests for production of documents) shall be served on or before March 31, 2005, responses to be served on or before May 1, 2005.
- d. Non-expert depositions shall be completed on or before August 1, 2005.
- e. Plaintiff's expert witnesses shall be designated, and Rule 26(a)(2) information provided to defendant, by July 15, 2005.
- f. Defendant's expert witnesses shall be designated, and Rule 26(a)(2) information provided to plaintiff, by August 15, 2005.
- g. All expert witness depositions shall be completed by September 15, 2005.
- h. Motions for Summary Judgment shall be filed on or before September 30, 2005. Any Opposition shall be filed on or before October 31, 2005. Any Reply to Opposition shall be filed on or before November 21, 2005.

4. **Trial by Magistrate Judge**

The parties consent to trial by Magistrate Judge.

5. **Rule 16.1(D) (3) Certifications**

The parties are submitting separately their certifications regarding consultation on litigation budgets and alternative dispute resolution as required by Local Rule 16.1(D) (3).

PATRICIA WASHINGTON

By her attorney,

/s/ Suzanne Garrow

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SPRINGFIELD COLLEGE

By its attorneys,

/s/ James E. Wallace, Jr.

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Dated: December 1, 2004